

**BellSouth Telecommunications, Inc.**

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October 7, 2004

Mr. George N. Dorn, Jr.  
Interim Executive Director  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region  
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of  
1996  
Docket No. 2001-209-C

Dear Mr. Dorn:

Enclosed for filing are: (1) the original and ten copies of a Joint Stipulation of Material Facts ("Stipulation") submitted by BellSouth Telecommunications, Inc. ("BellSouth"), US LEC of South Carolina ("US LEC"), the South Eastern Competitive Carriers Association ("SECCA"), and the Competitive Carriers of the South, Inc. ("CompSouth"); and (2) a CD ROM containing various documents referenced in the Stipulation.

Although the parties' representatives have had scheduling conflicts this week that have prevented us from finalizing a proposed schedule, I am optimistic that within another day or two, we can develop and submit a mutually-agreeable proposed schedule for briefing and oral argument for the Commission's consideration.

Mr. George N. Dorn, Jr.  
October 7, 2004  
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By copy of this letter I am serving all parties of record with a copy of this motion as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive style with a large, stylized "P" and "T".

Patrick W. Turner

cc: F. David Butler, Esquire  
Florence B. Belser, Esquire  
Dr. James E. Spearman

Enclosures  
PC Docs #552879

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2001-209-C

IN RE: )  
 )  
Application of BellSouth )  
Telecommunications, Inc. to )  
Provide In-Region InterLATA )  
Services Pursuant to Section )  
271 of the Telecommunications )  
Act of 1996 )  
\_\_\_\_\_ )

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FILED  
PUBLIC SERVICE COMMISSION  
SOUTH CAROLINA

**JOINT STIPULATION OF MATERIAL FACTS**

BellSouth Telecommunications, Inc. ("BellSouth"), US LEC of South Carolina ("US LEC"), the South Eastern Competitive Carriers Association ("SECCA"), and the Competitive Carriers of the South, Inc. ("CompSouth") respectfully submit the following Joint Stipulation of Material Facts ("Stipulation") regarding BellSouth's letter withdrawing its Statement of Generally Available Terms and Conditions ("SGAT"):

1. On May 16, 2001, BellSouth filed its SGAT with the Public Service Commission of South Carolina ("the Commission"). A copy of that filing is included on the CD ROM that is attached to this Stipulation as Exhibit A.
2. No CLEC operating in South Carolina is being provided service, or ever has been provided service, under the SGAT identified in Paragraph 1.
3. On May 30, 2002, BellSouth filed certain modifications to the SGAT with the Commission. A copy of that filing is included on the CD ROM that is attached to this Stipulation as Exhibit A.
4. No CLEC operating in South Carolina is being provided service, or ever has been provided service, under the modified SGAT identified in Paragraph 3.

5. On June 17, 2002, BellSouth filed certain modifications to the SGAT with the Commission. A copy of that filing is included on the CD ROM that is attached to this Stipulation as Exhibit A.

6. No CLEC operating in South Carolina is being provided service, or ever has been provided service, under the modified SGAT identified in Paragraph 5.

7. On January 16, 2004, BellSouth filed its then-current Standard Interconnection Agreement ("SIA") with the Commission, along with a letter stating that BellSouth has elected to replace its then-current South Carolina SGAT with the SIA. A copy of that filing is included on the CD ROM that is attached to this Stipulation as Exhibit A.

8. No CLEC operating in South Carolina is being provided service, or ever has been provided service, under the SIA identified in Paragraph 7.

9. The current version of BellSouth's SIA is maintained on its website at [http://www.interconnection.bellsouth.com/become\\_a\\_clec/docs/ics\\_agreement.pdf](http://www.interconnection.bellsouth.com/become_a_clec/docs/ics_agreement.pdf). This agreement includes those unbundled network elements ("UNEs") that BellSouth believes must still be provided at Total Element Long Run Incremental Costs ("TELRIC") rates pursuant to Section 252 of the federal Telecommunications Act.

10. A competitive carrier may execute the then-current version of the SIA in its entirety to avoid negotiating or arbitrating an interconnection agreement with BellSouth in South Carolina.

11. All interconnection agreements between BellSouth and US LEC, between BellSouth and any member of SECCA, and between BellSouth and any member of CompSouth that are on file with the Commission, including all amendments thereto that are on file with the Commission, are incorporated by reference into the record of this proceeding.

Respectfully submitted on this the 7th day of October, 2004.

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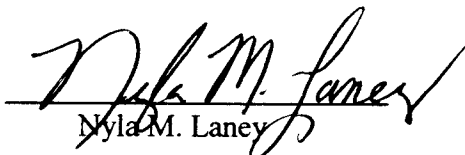
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